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October 24, 2023

VIA ECF AND EMAIL

The Honorable Analisa Torres
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007
Torres_NYSDChambers@nysd.uscourts.gov

**Re: Proskauer Rose LLP v. O'Brien
No. 1:22-CV-10918-AT (S.D.N.Y.)**

Dear Judge Torres,

We represent Defendant Jonathan O'Brien ("Mr. O'Brien") in the above-referenced matter. We submit this letter on behalf of both parties.

Since the parties' last letter to the Court on October 4, 2023 [ECF No. 105], the parties have continued to actively negotiate the terms of a settlement agreement and have made significant progress. The parties are optimistic that they will be able to finalize a settlement agreement within approximately thirty (30) days. Accordingly, rather than seek a further extension of any deadlines at this time, the parties respectfully propose the following for the Court's consideration and approval:

- The Court orders a stay of all case deadlines until December 3, 2023.
- On or before December 3, 2023, the parties file a report (the "Joint Report") with the Court concerning the status of settlement and the need, if any, for a continuation of the stay.
- If, in the Joint Report, the parties report that negotiations have failed, the parties will request a scheduling conference at the Court's earliest convenience.
- In advance of that conference, the parties will work in good faith to agree on a joint scheduling proposal to the Court and will submit such proposal in



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advance of the scheduling conference, noting all areas of agreement and continued disagreement.

We appreciate the Court's consideration of, and attention to, this matter.

Respectfully submitted,

BECK REED RIDEN, LLP

A handwritten signature in blue ink, appearing to read 'Russell Beck', is written over a light blue rectangular background. The signature is fluid and cursive.

Russell Beck

cc: Counsel of Record (via ECF)